

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN DOE,

Plaintiff,

v.

HARVARD UNIVERSITY, HARVARD
UNIVERSITY BOARD OF OVERSEERS,
THE PRESIDENT AND FELLOWS OF
HARVARD COLLEGE, and BRIGID
HARRINGTON, in her individual and official
capacity,

Defendants.

Civil Action No. 1:18-cv-12150-IT

JOINT MOTION TO EXTEND SUMMARY JUDGMENT DEADLINES

Plaintiff John Doe and Defendants Harvard University and The President and Fellows of Harvard College (“Harvard”)¹ request an extension of the current deadlines for the filing of summary judgment motions. In support of this Motion, the parties respectfully state:

1. The current summary judgment briefing schedule set by the Court is as follows:
 - a. Summary judgment motions due April 30, 2021;
 - b. Any oppositions briefs due May 28, 2021; and
 - c. Any reply briefs due June 21, 2021.
2. The parties have worked diligently to meet these deadlines, but several issues have caused unexpected delay. These include deadlines in other litigation matters, and continued

¹ On December 5, 2018, Defendant Harvard University Board of Overseers was voluntarily dismissed as a defendant. *See* Dkt. No. 14. On May 28, 2020, the court dismissed Investigator Harrington as a defendant in this case. *See* Dkt. No. 68.

complications attendant to gathering information from a number of individuals working remotely and subject to limitations caused by the Covid-19 pandemic.

3. Accordingly, the parties respectfully request that the Court adjust the briefing schedule as follows:

Deadlines	Current Date	Proposed Date
Summary Judgment motions due	April 30, 2021	May 14, 2021
Opposition briefs due	May 28, 2021	June 11, 2021
Reply briefs due	June 21, 2021	July 5, 2021

4. On March 19, 2021, the Court granted Defendants' Assented-to Motion for Extension of Time to File Summary Judgment Motions. ECF No. 83. The parties now seek a limited two-week extension to address unexpected delays that have arisen since March 19, 2021. Neither Plaintiff nor Defendants intend to seek additional extensions to the summary judgment briefing schedule.

5. Finally, no party will be prejudiced by the Court granting the relief requested herein.

WHEREFORE, the parties respectfully request that the Court grant this motion and adjust the deadlines as described above.

Dated: April 30, 2021

Respectfully submitted,

/s/ Tara J. Davis

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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred in good faith with counsel for Defendants regarding the foregoing Motion. Defendants, through counsel, have joined in the Motion.

/s/ Tara Davis

Tara Davis

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 30, 2021.

/s/ Tara Davis

Tara Davis